

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-mj-02286-McAliley

UNITED STATES OF AMERICA

v.

GREGORY BRUCE HILL,

Defendant.

\_\_\_\_\_ /

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? ☐ Yes ☒ No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? ☐ Yes ☒ No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? ☐ Yes ☒ No

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America  
v.

Gregory Bruce Hill,

*Defendant.*

Case No. 22-mj-02286-McAliley

**CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 23, 2022 in the county of Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)

*Offense Description*

Possession of a Firearm and Ammunition by a Convicted Felon

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



*Complainant's signature*

Volkan Ersozlu, TFO, FBI

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.

Date: February 24, 2022



*Judge's signature*

City and state: Miami, Florida

Hon. Chris M. McAliley, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Volkan Ersozlu being duly sworn, deposes and states as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”) in Miami, Florida, assigned to the Violent Crimes Task Force, and have been so employed there since May 2019. My duties involve the investigation of a variety of violations of federal offenses, including bank robberies, Hobbs Act robberies, extortion, and firearm offenses. I am also employed by the City of Miami Police Department (“MPD”) as a Detective in the Robbery Unit. I have been a Robbery Unit Detective for five (5) years and working in law enforcement for over seven (7) years.

2. This Affidavit is made for the purpose of establishing probable cause in support of a criminal complaint charging Gregory Bruce Hill (“Hill”) with possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

3. The statements contained in this Affidavit are based on my personal knowledge, as well as information provided by other individuals, including other law enforcement officials, and my review of records and other evidence obtained during the course of this investigation. I have not included each and every fact known to me and to other law enforcement officers involved in this investigation, but only the facts sufficient to establish probable cause.

**PROBABLE CAUSE**

4. On or about February 23, 2022, MPD received a call from a witness, who asked to remain anonymous, regarding a black male with a beard wearing a white shirt in a burgundy Chevrolet Malibu bearing Florida tag QMBI70, who had been brandishing a firearm at citizens in front of a store located at NW 2nd Place and 62nd Street in Miami, Florida.

5. Officers arrived at the store location, where they observed the burgundy Chevrolet Malibu parked outside. There was one occupant in the vehicle, sitting in the rear passenger seat, but he did not match the description provided by the witness. MPD then went inside of the store and observed a black male, who matched the description provided by the witness, sitting on a stool playing a gambling machine. The man was later identified as Hill.

6. The officer observed the outline of a firearm in Hill's waistband, concealed under his white shirt. The officer asked Hill whether there was a firearm in his waist, at which point Hill said no. The officer then conducted a pat down of Hill's person and felt the firearm in Hill's waistband. Officers removed a Silver COLT .45 firearm, serial number SF25493, which was loaded with ammunition.

7. A record check of the firearm that was recovered from Hill revealed that the firearm was stolen on January 8, 2014, which is referenced in Miramar Police Department case number 1401-02064.

8. A review of Hill's criminal history revealed that Hill has more than one felony conviction, each punishable by imprisonment for a term exceeding one year.


9. Furthermore, Your Affiant confirmed that the firearm and ammunition were manufactured outside the State of Florida and have, therefore, traveled in interstate commerce.

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**CONCLUSION**

10. Based on my training and experience and the facts detailed above, I respectfully submit that there is probable cause to believe that, on or about February 23, 2022, in Miami-Dade County, in the Southern District of Florida, Hill knowingly possessed a firearm in or affecting interstate or foreign commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

**FURTHER YOUR AFFIANT SAYETH NAUGHT**

  
\_\_\_\_\_  
Volkan Ersozlu, TFO  
Federal Bureau of Investigation

Attested to by the applicant in accordance  
with the requirements of Fed. Crim. P. 4.1  
by Face Time this 24th day of February, 2022.

  
\_\_\_\_\_  
HONORABLE CHRIS M. MCAULEY  
UNITED STATES MAGISTRATE JUDGE